

✓ TRACKED
✓ IN PROCESSED



February 18, 2011

Mr. Russell Wasem, Chemical Review Manager
Risk Management and Implementation Branch 1
Pesticide Re-evaluation Division (7508P)
Office of Pesticide Programs, U. S. EPA
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Imidacloprid - Generic 90-day DCI Response – Celsius Property B. V.

Dear Mr. Wasem:

Attached, please find the Generic 90-day response to the Imidacloprid Data Call-In for Celsius Property B. V., c/o Makhteshim Agan of North America, Inc. This response is for EPA Reg. No. 83558-34 (Imidacloprid Technical).

Enclosed, in support of this DCI response, please find:

- Data Call-In Response Form – Generic
- Requirements Status and Registrant's Response - Generic
- EPA Form 8570-32, Certification of Offer to Cost Share in the Development of Data
- Copy of Offer to Cost Share letters (along with accompanying delivery and receipt documents)

Please note that for the study data gaps listed on the Requirements Status and Registrant's Response Form, we have chosen OPTION 3 (offer to cost share). We have made offers to cost share to Bayer Environmental Science; Lanxess Corporation; United Phosphorus, Inc.; Nufarm, Inc.; Nufarm Americas Inc.; Bayer CropScience LP; Hebei Veyong BioChemical Co., Ltd.; Advan LLC; Amtide LLC; Albaugh Inc.; Control Solutions, Inc.; Rotam Limited; Source Dynamics, LLC; Sharda Worldwide Exports PVT, LTD.; and Ensystex III, Inc. We will be relying on the data which they submit in support of this chemical.

If you have any questions or concerns regarding this 90-day Data Call In response, please contact me at (919) 256-9323 or lp ruett@manainc.com.

Best Regards,

2/23/11
LP

P. Leanne Pruett
Regulatory Product Manager

Encl.

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address CELSIUS PROPERTY B.V., AMSTERDAM (NL) 4515 FALLS OF NEUSE RD., SUITE 300 RALEIGH, NC 27609		2. Case # and Name Chemical # and Name 129099 Imidacloprid		3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
83558-34			✓	N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date	
Signature and Title of Company's Authorized Representative <i>P. de Vries, Regulatory Product Mgr.</i>				2-18-2011	
10. Name of Company Celsius Property B.V., Amsterdam (NL)				11. Phone Number 919-256-9323	

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address CELSIUS PROPERTY B.V., AMSTERDAM (NL) 4515 FALLS OF NEUSE RD., SUITE 300 RALEIGH, NC 27609		2. Case # and Name Chemical # and Name 129099 Imidacloprid		3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160					
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
835.4300	<u>Environmental Fate Data Requirements (Conventional Chemical)</u> Aerobic aquatic metabolism					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI or PAIRA	24	3
850.4100	<u>Nontarget Plant Protection Data Requirements (Conventional Chemical)</u> Terrestrial plant toxicity, Tier 1 (seeding emergence) (5, 10)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4150	Terrestrial plant toxicity, Tier 1 (vegetative vigor) (3, 11, 12)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4400	Aquatic plant toxicity test using Lemna spp. Tiers I and II (4)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP or TGAI	12	3
875.2300	<u>Post-Application Exposure Data Requirements (Conventional Chemical)</u> Indoor surface residue dissipation (1, 13, 14)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.3040	<u>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</u> Field testing for pollinators (2, 15)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	24	3
870.7800	<u>Toxicology Data Requirements (Conventional Chemical)</u> Immunotoxicity					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI	12	3
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law						11. Date			
Signature and Title of Company's Authorized Representative <i>P. Jeanne Powell</i> , Regulatory Prod. Mgr.						2-18-2011			
12. Name of Company Celsius Property BV, Amsterdam (NL)						13. Phone Number 919-256-9323			

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address CELSIUS PROPERTY B.V., AMSTERDAM (NL) 4515 FALLS OF NEUSE RD., SUITE 300 RALEIGH, NC 27609		2. Case # and Name Chemical # and Name 129099 Imidacloprid			3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
Special Study	Residue Analysis of Nectar and Pollen in Flowering Crops (7,8,9,17)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	48	3
Special Study	Seed Leaching Study Using TEP (6,16)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
Initial to indicate certification as to information on this page (full text of certification is on page one).		PYP					Date 2-18-2011		



United States Environmental Protection Agency
Washington, D.C. 20460

CERTIFICATION OF ATTEMPT TO ENTER INTO AN
AGREEMENT WITH REGISTRANTS FOR
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;
2070-0107; 2070-0122;
2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

Celsius Property B. V., Amsterdam (NL)

Company Number

83558

Chemical Name

Imidacloprid

EPA Chemical Number

129099

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

Bayer Environmental Science (Co. No. 432)
Lanxess Corporation (Co. No. 39967)
United Phosphorus, Inc. (Co. No. 70506)
Nufarm, Inc. (Co. No. 71368)
Nufarm Americas, Inc. (Co. No. 228)
Bayer Cropscience LP (Co. No. 264)
Hebei Veyong Bio-Chemical Co. Ltd, (Co. No. 84456)
Advan LLC (Co. No. 83070)

Amtide, LLC (Co. No. 83851)
Albaugh, Inc. (Co. No. 42750)
Control Solutions, Inc. (Co. No. 53883)
Rotam Limited (Co. No. 81598)
Source Dynamics LLC (Co. No. 82542)
Sharda Worldwide Exports
PVT., LTD. (Co. No. 82633)
Ensystex III, Inc. (Co. No. 82957)

Date of Offer

February 11, 2011

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date

Feb. 18, 2011

Name and Title (Please Print or Type)

P. Leanne Pruett, Regulatory Product Manager



February 11, 2011

Bayer Cropscience LP
P. O. Box 12014
2 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir/Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide Imidacloprid (Chemical Code 129099). Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. To the extent required by FIFRA Section 3(c)(2)(B), MANA hereby offers to jointly develop and/or share in the cost of developing the following data:

- OPPTS Guideline 835.4300; Aerobic Aquatic Metabolism
- OPPTS Guideline 850.4100; Terrestrial Plant Toxicity, Tier 1 (seedling emergence)
- OPPTS Guideline 850.4150; Terrestrial Plant Toxicity, Tier 1 (vegetative vigor)
- OPPTS Guideline 850.4400; Aquatic Plant Toxicity Test using Lemna spp. Tiers 1 and II
- OPPTS Guideline 875.2300; Indoor Surface Residue Dissipation
- OPPTS Guideline 850.3040; Field Testing for Pollinators
- OPPTS Guideline 870.7800; Immunotoxicity
- Special Study; Residue Analysis of Nectar and Pollen in Flowering Crops
- Special Study; Seed Leaching Study Using TEP

This offer does not extend to field pollinator data, bee toxicity, residue or similar data previously submitted to EPA by BCS; this offer is restricted to only those data that will be jointly developed specifically to satisfy the Data Call-In issued by EPA. If, at a later date, EPA determines that previously submitted data satisfy one or more of the above data requirements, Celsius will issue another offer to pay specifically citing those studies relied upon by EPA to support the imidacloprid registration.

We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh, NC 27609

Origin ID: RZZA



J1110101220225

SHIP TO: (919) 549-2425

BILL SENDER

Mark McAuley
Bayer CropScience LP
2 T.W. Alexander Drive

Research Triangle Pa, NC 27709

Ship Date: 15FEB11
ActWgt: 0.5 LB
CAD: 1386715/INET3130

Delivery Address Bar Code



Ref # PLP - IMD DCI OCS
Invoice #
PO #
Dept #



TRK# 7944 2844 4544
0201

22 MXEA

50DG182C27EFB

THU - 17 FEB A1
**** 2DAY ****

27709
NC-US
RDU

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Wednesday, February 16, 2011 10:20 AM
To: Leanne Pruett
Subject: FedEx Shipment 794428444544 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP - IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 16, 2011 10:16 AM
Sign for by: V.WILLIAM
Delivery location: DURHAM, NC
Delivered to: Shipping/Receiving
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [794428444544](https://www.fedex.com/track/794428444544)

Shipper Information

Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh
NC
US
27609

Recipient Information

Mark McAuley
Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park
NC
US
27709

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From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.5 LB
 CAD: 1386715/NET3130

Delivery Address Bar Code



SHIP TO: (412) 809-4773
Luanne Jeram
Lanxess Corporation
111 PARKWEST DR

BILL SENDER

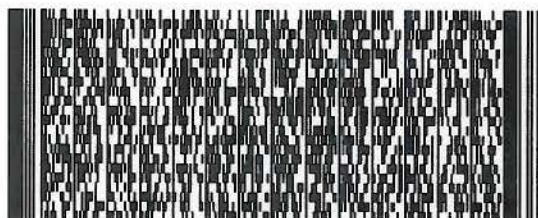
Ref # PLP - IMD DCI OCS
 Invoice #
 PO #
 Dept #

PITTSBURGH, PA 15275

THU - 17 FEB A1
**** 2DAY ****

TRK# 7944 2847 5716
 0201

15275
 PA-US
 PIT

**SB OILA**

50DG1/82C2/7EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 11:11 AM
To: Leanne Pruett
Subject: FedEx Shipment 794428475716 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP - IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 9:36 AM
Sign for by: R.SCRODER
Delivery location: PITTSBURGH, PA
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [794428475716](https://www.fedex.com/track/794428475716)

Shipper Information	Recipient Information
Leanne Pruett	Luanne Jeram
Makhteshim Agan of North America	Lanxess Corporation
4515 Falls of Neuse Road	111 PARKWEST DR
Suite 300	PITTSBURGH
Raleigh	PA
NC	US
US	15275
27609	

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From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/INET3130

Delivery Address Bar Code



SHIP TO: (610) 491-2814

BILL SENDER

Dave Olsen
 United Phosphorus, Inc.
 630 FREEDOM BUSINESS CTR DR STE 402

KING OF PRUSSIA, PA 19406

Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

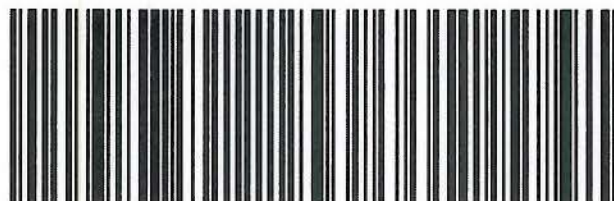
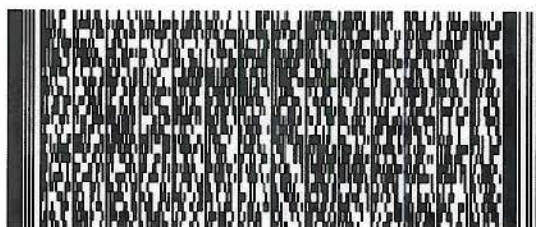
THU - 17 FEB A2
 ** 2DAY **

TRK# 7967 6565 4329

0201

SF KPDA

19406
 PA-US
 PHL



50DG1R2C2/EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Friday, February 18, 2011 9:43 AM
To: Leanne Pruett
Subject: FedEx Shipment 796765654329 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 18, 2011 9:34 AM
Sign for by: D.FAGO
Delivery location: KING OF PRUSSIA, PA
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [796765654329](https://www.fedex.com/track/796765654329)

Shipper Information	Recipient Information
Leanne Pruett	Dave Olsen
Makhteshim Agan of North America	United Phosphorus, Inc.
4515 Falls of Neuse Road	630 FREEDOM BUSINESS CTR DR STE 402
Suite 300	KING OF PRUSSIA
Raleigh	PA
NC	US
US	19406
27609	

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February 11, 2011

Nufarm, Inc.
150 Harvester Drive
Suite 200
Burr Ridge, IL 60527

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Nufarm, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/INET3130

Delivery Address Bar Code



SHIP TO: (630) 455-2000

BILL SENDER

Nathan Ehresman
Nufarm Americas, Inc.
150 HARVESTER DR STE 200

BURR RIDGE, IL 60527

Ref # PLP - IMD DCI OCS
 Invoice #
 PO #
 Dept #

THU - 17 FEB A1
**** 2DAY ****

TRK# 7967 6567 9171
 0201

60527
 IL-US
 ORD

SE ENLA

50DG1R2C27EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Friday, February 18, 2011 1:03 PM
To: Leanne Pruett
Subject: FedEx Shipment 796765679171 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP - IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 18, 2011 11:58 AM
Sign for by: T.HAROUP
Delivery location: HILLSIDE, IL
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [796765679171](#)

Shipper Information	Recipient Information
Leanne Pruett	Nathan Ehresman
Makhteshim Agan of North America	Nufarm Americas, Inc.
4515 Falls of Neuse Road	150 HARVESTER DR STE 200
Suite 300	BURR RIDGE
Raleigh	IL
NC	US
US	60527
27609	

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February 11, 2011

Hebei Veyong Bio-Chemical Co., Ltd
c/o Wagner Regulatory Associates, Inc.
P. O. Box 640
7460 Lancaster Pike, Suite 9
Hockessin, DE 19707-0640

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Hebei Veyong, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/NET3130

Delivery Address Bar Code



SHIP TO: (302) 234-7570

BILL SENDER

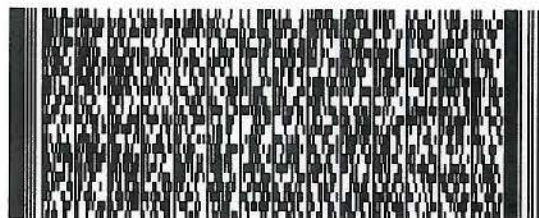
Jim Wagner
Wagner Regulatory Associates, Inc.
7460 LANCASTER PIKE STE 9

HOCKESSIN, DE 19707

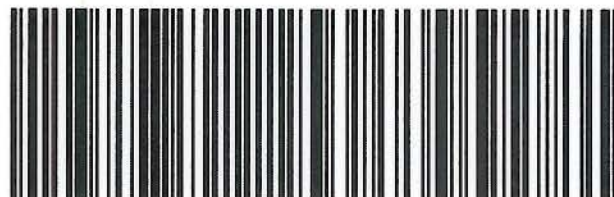
Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

THU - 17 FEB A2
**** 2DAY ****

TRK# 7967 6572 8493
 0201

**SF ILGA**

19707
 DE-US
 PHL



50DG1/R2C2/EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 11:12 AM
To: Leanne Pruett
Subject: FedEx Shipment 796765728493 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 11:05 AM
Sign for by: J.BARQE
Delivery location: NEW CASTLE, DE
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [796765728493](https://www.fedex.com/track/796765728493)

Shipper Information	Recipient Information
Leanne Pruett	Jim Wagner
Makhteshim Agan of North America	Wagner Regulatory Associates, Inc.
4515 Falls of Neuse Road	7460 LANCASTER PIKE STE 9
Suite 300	HOCKESSIN
Raleigh	DE
NC	US
US	19707
27609	

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February 11, 2011

Advan, LLC
2520 Meridian Pkwy, Suite 525
Durham, NC 27713

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Advan, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/INET3130

Delivery Address Bar Code



SHIP TO: (919) 226-1288

BILL SENDER

Liz Rea
 Advan LLC
 2520 MERIDIAN PKWY STE 525

DURHAM, NC 27713

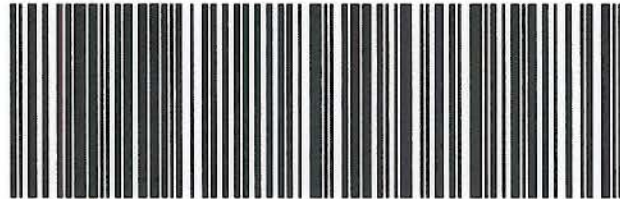
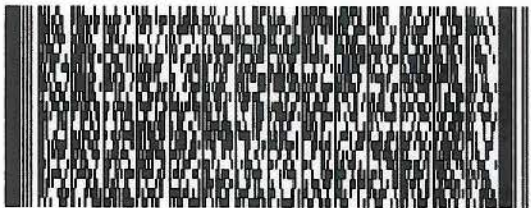
Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

THU - 17 FEB A1
 ** 2DAY **

TRK# 7944 2896 1779
 0201

22 RDU

27713
 NC-US
 RDU



50DG1/82C2/7EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Wednesday, February 16, 2011 9:37 AM
To: Leanne Pruett
Subject: FedEx Shipment 794428961779 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 16, 2011 9:31 AM
Sign for by: J.BUREY
Delivery location: DURHAM, NC
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [794428961779](https://www.fedex.com/track/794428961779)

Shipper Information

Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh
NC
US
27609

Recipient Information

Liz Rea
Advan LLC
2520 MERIDIAN PKWY STE 525
DURHAM
NC
US
27713

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From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/INET3130

Delivery Address Bar Code



SHIP TO: (949) 753-4723

BILL SENDER

Deri Wang
 Amtide, LLC
 21 HUBBLE

IRVINE, CA 92618

Ref #
 Invoice #
 PO #
 Dept #

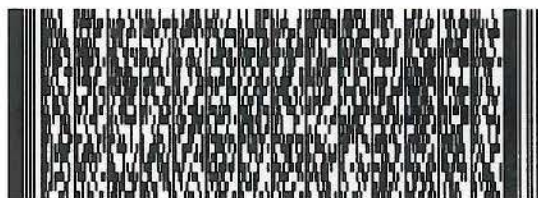
THU - 17 FEB A1
 ** 2DAY **

TRK# 7944 2899 9474

0201

SA NZJA

92618
 CA-US
 SNA



50D/G1/82C2/7EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 3:57 PM
To: Leanne Pruett
Subject: FedEx Shipment 794428999474 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 12:51 PM
Sign for by: K.NGUYEN
Delivery location: IRVINE, CA
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [794428999474](https://www.fedex.com/track/794428999474)

Shipper Information	Recipient Information
Leanne Pruett	Deri Wang
Makhteshim Agan of North America	Amtide, LLC
4515 Falls of Neuse Road	21 HUBBLE
Suite 300	IRVINE
Raleigh	CA
NC	US
US	92618
27609	

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Thank you for your business.



February 11, 2011

Albaugh, Inc.
1525 NE 36th Street
Ankeny, IA 50021

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Albaugh, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/INET3130

Delivery Address Bar Code



SHIP TO: (515) 964-9444
Stuart Feldstein
Albaugh, Inc.
1525 NE 36TH ST

BILL SENDER

Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

ANKENY, IA 50021

THU - 17 FEB A1

** 2DAY **

TRK# 7944 2902 2784

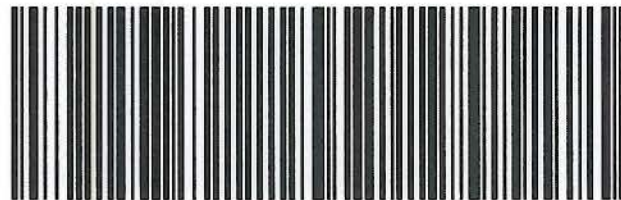
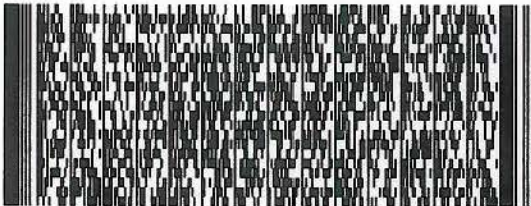
0201

SC DSMA

50021

IA-US

DSM



500G1/82C2/7EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 10:00 AM
To: Leanne Pruett
Subject: FedEx Shipment 794429022784 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 8:54 AM
Sign for by: C.HOSKINS
Delivery location: DES MOINES, IA
Delivered to: Receptionist/Front Desk
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Tracking number: [794429022784](#)

Shipper Information	Recipient Information
Leanne Pruett	Stuart Feldstein
Makhteshim Agan of North America	Albaugh, Inc.
4515 Falls of Neuse Road	1525 NE 36TH ST
Suite 300	ANKENY
Raleigh	IA
NC	US
US	50021
27609	

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February 11, 2011

Control Solutions, Inc.
c/o D. O'Shaughnessy Consulting, Inc.
427 Hide Away Circle
Cub Run, KY 42729

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Control Solutions, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/INET3130

Delivery Address Bar Code



SHIP TO: (270) 524-5633

BILL SENDER

Don O'Shaughnessy
D O'Shaughnessy Consulting, Inc.
427 HIDE AWAY CIR

CUB RUN, KY 42729

Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

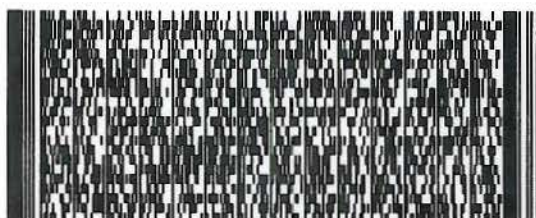
THU - 17 FEB A6**** 2DAY ****

TRK# 7944 2906 5456

0201

RES**42729**

KY-US

SDF**SB BRYB**

50DG1R2C27EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 11:52 AM
To: Leanne Pruett
Subject: FedEx Shipment 794429065456 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 10:32 AM
Sign for by: Signature not required
Delivery location: ELIZABETHTOWN, KY
Delivered to: Residence
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Residential Delivery
Deliver Weekday

Tracking number: [794429065456](https://www.fedex.com/track/794429065456)

Shipper Information

Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh
NC
US
27609

Recipient Information

Don O'Shaughnessy
D O'Shaughnessy Consultinig, Inc.
427 HIDE AWAY CIR
CUB RUN
KY
US
42729

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From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/NET3130

Delivery Address Bar Code



SHIP TO: (215) 497-9501

BILL SENDER

Frank Sobotka
 IPM Resources LLC
 4032 CROCKERS LAKE BLVD APT 818

SARASOTA, FL 34238

Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

THU - 17 FEB A4

** 2DAY **

TRK# 7967 6630 9964

0201

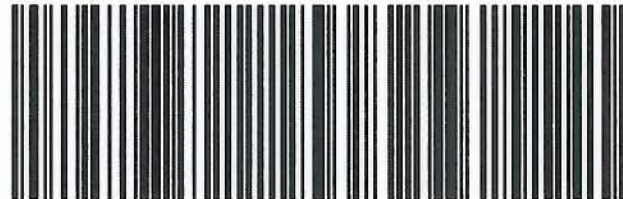
RES

34238

FL-US

TPA

SC SRQA



50DG1R2C27EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 1:58 PM
To: Leanne Pruett
Subject: FedEx Shipment 796766309964 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 1:49 PM
Sign for by: Signature not required
Delivery location: SARASOTA, FL
Delivered to: Residence
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Residential Delivery
Deliver Weekday

Tracking number: [796766309964](https://www.fedex.com/track/796766309964)

Shipper Information

Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh
NC
US
27609

Recipient Information

Frank Sobotka
IPM Resources LLC
4032 CROCKERS LAKE BLVD APT 818
SARASOTA
FL
US
34238

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February 11, 2011

Source Dynamics, LLC
10039 E. Troon North Drive
Scottsdale, AZ 85262

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Source Dynamics, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/NET3130

Delivery Address Bar Code



SHIP TO: (480) 502-9289
Source Dynamics LLC

BILL SENDER

10039 E TROON NORTH DR

SCOTTSDALE, AZ 85262

Ref # PLP- IMD DCI OCS
 Invoice #
 PO #
 Dept #

THU - 17 FEB A6

** 2DAY **

RES

85262

AZ-US

PHX

TRK# 7967 6643 6490

0201

SA SCFA

50DG182C27EFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 1:12 PM
To: Leanne Pruett
Subject: FedEx Shipment 796766436490 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lpruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP- IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 11:07 AM
Sign for by: Signature not required
Delivery location: SCOTTSDALE, AZ
Delivered to: Residence
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Residential Delivery
Deliver Weekday

Tracking number: [796766436490](https://www.fedex.com/track/796766436490)

Shipper Information

Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh
NC
US
27609

Recipient Information
Source Dynamics LLC
10039 E TROON NORTH DR
SCOTTSDALE
AZ
US
85262

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February 11, 2011

Ensystem III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St., NW
Gig Harbor, WA 98332

RE: Imidacloprid Generic Data Call-In Dated November 10, 2010

Dear Sir or Madam:

On November 10, 2010, the U. S. EPA issued a generic data call-in (DCI) for the pesticide imidacloprid. Makhteshim Agan of North America, Inc. (MANA) (as agent for Celsius Property B. V., Amsterdam (NL)) is a recipient of the November 10, 2010 DCI. MANA hereby offers to jointly develop and/or share in the cost of developing the data with Ensystem III, to the extent required by FIFRA Section 3(c)(2)(B). We offer to commence negotiations to reach agreement on the terms for jointly developing the data. This offer is irrevocable and includes an offer to be bound by arbitration decision under Sec. 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms cannot be reached otherwise.

Best Regards,

P. Leanne Pruett
Regulatory Product Manager
Makhteshim Agan of North America, Inc.

From: (919) 256-9323
 Leanne Pruett
 Makhteshim Agan of North America
 4515 Falls of Neuse Road
 Suite 300
 Raleigh, NC 27609

Origin ID: RZZA



J11101012220225

SHIP TO: (253) 853-7369

BILL SENDER

Janelle Kay
 Pyxis Regulatory Consulting, Inc.
 4110 136th Street NW

Gig Harbor, WA 98332

Ship Date: 15FEB11
 ActWgt: 0.3 LB
 CAD: 1386715/NET3130

Delivery Address Bar Code



Ref # PLP-IMD DCI OCS
 Invoice #
 PO #
 Dept #

THU - 17 FEB A6

** 2DAY **

TRK# 7944 2930 6672

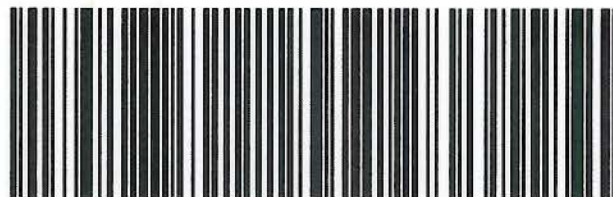
0201

SB TCMA

98332

WA-US

SEA



50DG1R2C2/TEFB

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Leanne Pruett

From: TrackingUpdates@fedex.com
Sent: Thursday, February 17, 2011 3:13 PM
To: Leanne Pruett
Subject: FedEx Shipment 794429306672 Delivered

This tracking update has been requested by:

Company Name: Makhteshim Agan of North America
Name: Leanne Pruett
E-mail: lp ruett@manainc.com

Our records indicate that the following shipment has been delivered:

Reference: PLP-IMD DCI OCS
Ship (P/U) date: Feb 15, 2011
Delivery date: Feb 17, 2011 12:04 PM
Sign for by: Signature not required
Delivery location: TACOMA, WA
Delivered to: Residence
Service type: FedEx 2Day
Packaging type: FedEx Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Residential Delivery
Deliver Weekday

Tracking number: [794429306672](https://www.fedex.com/track/794429306672)

Shipper Information

Leanne Pruett
Makhteshim Agan of North America
4515 Falls of Neuse Road
Suite 300
Raleigh
NC
US
27609

Recipient Information

Janelle Kay
Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbor
WA
US
98332

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